

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

RUSSELL F. SHEEHAN, as he is ADMINISTRATOR,
ELECTRICAL WORKERS' HEALTH AND
WELFARE FUND, LOCAL 103, I.B.E.W.;
ELECTRICAL WORKERS' PENSION FUND,
LOCAL 103, I.B.E.W.; ELECTRICAL WORKERS'
SUPPLEMENTARY HEALTH AND WELFARE
FUND, LOCAL 103, I.B.E.W.; ELECTRICAL
WORKERS' DEFERRED INCOME FUND,
LOCAL 103, I.B.E.W.; ELECTRICAL WORKERS'
JOINT APPRENTICESHIP AND TRAINING
FUND, LOCAL 103, I.B.E.W.; ELECTRICAL
WORKERS' EDUCATIONAL AND CULTURAL
FUND; ANTHONY J. SALAMONE, as he is
ADMINISTRATOR, NATIONAL ELECTRICAL
BENEFIT FUND; and LOCAL 103, INTERNATIONAL
BROTHERHOOD OF ELECTRICAL WORKERS,
Plaintiffs

vs.

CHRIS MEALEY ELECTRICAL, INC.,
Defendant

and

FIRST TRADE UNION BANK and FLEET BANK,
Trustees

C.A. No. 04-12209 EFH

PLAINTIFFS' MOTION FOR COMPLIANCE WITH COURT ORDER

Plaintiffs, Russell F. Sheehan, as he is Administrator, et al, respectfully move this honorable Court for an order compelling Defendant Chris Mealey Electrical, Inc. to fully comply with the terms of this Court's Order of February 15, 2006, wherein this Court endorsed the Plaintiffs' Recommendation of February 9, 2006 with regard to this Court's finding of contempt

against the Defendant's owner Christopher J. Mealey.

In their Recommendation to this Court, the Plaintiffs sought documents for the years 2004 and 2005, such as tax returns, which would substantiate that Chris Mealey Electrical, Inc. was no longer in operation as of April, 2004. Mr. Mealey has supplied the corporation's tax return for the year 2004, but has stated that he does not yet have a 2005 tax return for Chris Mealey Electrical, Inc. Plaintiffs have alternatively requested from Mr. Mealey a letter from his accountant confirming that the corporation did not conduct any business in 2005. Although Mr. Mealey stated that he would be able to provide said letter, it has not been received by the Plaintiffs to date. The Plaintiffs' Recommendation stated that all such verifying documents should be provided no later than February 17, 2006.

WHEREFORE, the Plaintiffs respectfully move this honorable Court for an order compelling Defendant Chris Mealey Electrical, Inc. to fully comply with the terms of this Court's Order of February 15, 2006.

Respectfully submitted,

RUSSELL F. SHEEHAN, as he is
ADMINISTRATOR, ELECTRICAL
WORKERS' HEALTH AND WELFARE
FUND, LOCAL 103, I.B.E.W., et al,

By their attorneys,

/s/ Gregory A. Geiman
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(617) 742-0208

Dated: February 22, 2006

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion for Compliance with Court Order has been served by certified and first class mail upon defendant Chris Mealey Electrical, Inc. at 90 Wilkins Road, Braintree, MA 02184 this 22nd day of February, 2006.

/s/ Gregory A. Geiman
Gregory A. Geiman, Esquire